

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
	:	Case No: 2:17-mj-324
	:	
v.	:	
	:	MAGISTRATE JUDGE DEAVERS
GREGORY R. LEE	:	

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and move this Court for an order extending the time for the return of an indictment or information pursuant to 18 U.S.C. § 3161(b) from July 22, 2017, to August 24, 2017. The defendant, Gregory R. Lee, is aware of his right to timely filing of an indictment or information, afforded to him under 18 U.S.C. § 3161(b), and hereby waives that right for the purposes of this motion. The parties believe this continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The government has provided significant discovery materials to counsel for the defendant, and the parties have engaged in discussions regarding pre-indictment resolution of this matter. However, due to ongoing investigation by the government and the likelihood that charges may be brought against this defendant in additional jurisdictions, numerous issues must still be addressed before a pre-indictment resolution of this matter can be reached. The parties anticipate that these issues will be addressed in short order and that pre-indictment resolution of the matter is likely. The parties have and will continue to exercise due diligence in reaching a prompt resolution of this matter, and are confident that only one extension of the indictment

deadline will be necessary. The parties are in agreement that an approximately one month continuance of the time for indictment would best serve the interests of justice, and the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).


For these reasons, the parties request an extension of the time within which an indictment or information may be filed in this case until August 24, 2017.

Respectfully submitted,


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s/Heather A. Hill

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GREGORY R. LEE
Defendant